

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Crim. No. 19- 10444
)
v.) Violation:
WILLIAM "Billy" ANGELESCO)
) <u>Count One</u> :
Defendant) Interfering with Commerce by Threats or Violence,
) 18 U.S.C. § 1951
) Aiding & Abetting (18 U.S.C. §§ 1951 & 2)
) 18 U.S.C. § 2 (Aiding & Abetting)
) <u>Robbery Forfeiture Allegation</u> :
) (18 U.S.C. § 981 and 28 U.S.C. § 2461)

INDICTMENT

COUNT ONE

Interfering with Commerce by Threats or Violence; Aiding and Abetting (18 U.S.C. § § 1951 & 2)

The Grand Jury charges:

On or about September 20, 2018, in Plymouth County, and elsewhere in the District of Massachusetts, defendant

WILLIAM "Billy" ANGELESCO

did, in any way and degree, obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did attempt and conspire to do so, in that the defendant did unlawfully obtain personal property belonging to and in the possession of John Doe, against his will, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to his person and property and property in his custody and possession.

In violation of Title 18, United States Code, Sections 1951 and 2.

ROBBERY FORFEITURE ALLEGATION

Upon conviction of the offense in violation of Title 18, United States Code,
 Section 1951, set forth in Count One, the defendant

WILLIAM "Billy" ANGELESCO

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

- 2. If any of the property described in Paragraph 1 above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant -
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with a third party;
 - c. has been placed beyond the jurisdiction of this Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property listed in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

LAURA J. KAPLAN

ASSISTANT UNITED STATES ATTORNEY

DISTRICT OF MASSACHUSETTS

District of Massachusetts: NOVEMBER _______, 2019
Returned into the District Court by the Grand Jurors and filed.

DEPUTY CLERK

a 1:00 PM 4/20/19